

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.

Chapter 11 Case No.
09-50026(REG)

Jointly Administered

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR
ANNIE ELLA COLLIER, ADMINISTRATRIX OF THE ESTATE OF
TINNIE COLLIER, DECEASED, AND ON BEHALF OF THE ESTATE AND
ALL WRONGFUL DEATH BENEFICIARIES OF TINNE COLLIER, DECEASED**

COMES NOW, William Liston and the law firm of Liston/Lancaster, PLLC, counsel of record for the Annie Ella Collier, Administratrix of the Estate of Tinnie Collier, Deceased, and on behalf of the Estate and all Wrongful Death Beneficiaries of Tinnie Collier, Deceased, and files its Motion to Withdraw as Counsel of record herein, and in support thereof, would show unto the Court as follows, to wit:

1. The Estate of Tinnie Collier has an unliquidated claim arising from personal injuries and wrongful death which was originally filed in the Circuit Court of Leake County, Mississippi, Civil Action No. 08:CV-197-LE-G.

2. The Bankruptcy of General Motors caused the unliquidated claim of the Estate of Collier to be brought into the instant case in the United States Bankruptcy Court for the Southern District of New York, Cause No. 09-50026 (REG).

3. The attorney-client relationship between the Movant and the Estate of Collier has deteriorated to a degree which prevents the Movant from further effective representation of the Estate of Collier. Further, the Employment Agreement executed between the Estate of Collier and Liston/Lancaster, PLLC provides for the withdrawal of counsel in such event.

4. It would be appropriate for the Court to allow the Estate of Collier Ninety (90) days to retain other counsel to enter an appearance, or announce that they are proceeding *Pro Se*.

WHEREFORE PREMISES CONSIDERED, the law firm of Liston/Lancaster, PLLC moves to be withdrawn from any further obligations or responsibilities pertaining to the representation of the Estate of Collier in this matter and to be allowed to withdraw as counsel of record for the Estate of Collier. Further, Movant petitions this Court to allow the Estate of Collier Ninety (90) days from the entry of the Order granting this Motion to retain other counsel who must enter an appearance, or to announce to the Court that they intend to proceed *Pro Se*.

DATED: This the 6th day of February, 2013.



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CERTIFICATE OF SERVICE

I, WILLIAM LISTON, do hereby certify that I have this day, mailed via United States Postal Service and Electronic Mail a true and correct copy of the foregoing to the following:

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This the 6TH day of February, 2013.



WILLIAM LISTON

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**ORDER TO WITHDRAW AS COUNSEL OF RECORD FOR
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ALL WRONGFUL DEATH BENEFICIARIES OF TINNE COLLIER, DECEASED**

THIS DAY this cause came on to be heard on the *ore tenus* Motion of William Liston and the law firm of Liston/Lancaster, PLLC for leave to withdraw as attorney in said cause; and the Court, after having maturely considered said Motion and having determined that the necessary parties have been given proper notice of this Motion finds that the same is well taken and should be sustained.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that William Liston and the law firm of Liston/Lancaster, PLLC be, and they are hereby removed as attorneys of record for Annie Ella Collier, Administratrix of the Estate of Tinnie Collier, Deceased and on behalf of the Estate and all Wrongful Death Beneficiaries of Tinnie Collier, Deceased, and that Annie Ella Collier, Administratrix of the Estate of Tinnie Collier, Deceased will have ninety (90) days from entry of this Order to either proceed *Pro Se* or retain other counsel.

SO ORDERED, ADJUDGED AND DECREED on this the ____ day of _____, A.D.,
2013.

JUDGE